Department of Toxic Substances Control

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From: Northern California Permits and
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Project Title: John Smith Road Landfill, Hazardous Waste Management Facility, Postclosure Permit

Project Location: 5 miles southeast of Hollister on John Smith Road
City: Unincorporated **County:** San Benito

Project Description: The project is the replacement of the existing postclosure permit and issuance of a new postclosure permit for the Hazardous Waste Management Facility (HWMF) at John Smith Road Landfill. John Smith Road Landfill stopped receiving hazardous waste in 1983 and the facility completed closure in 1993. The Closure Plan was approved by the Department of Toxic Substances Control (DTSC) with waste remaining in place in compliance with the Closure Plan. The Closure Plan required the items listed below to be implemented in order to properly close the facility. With closure certification, state and federal regulations require that a postclosure plan for a 30-year period be developed and implemented by the facility.

The postclosure permit outlines the procedures to fulfill these regulatory requirements, which consist of three primary functions: (1) Maintenance and operation of closure structures and treatment systems, (2) environmental monitoring, and (3) maintenance of financial mechanisms to fund the postclosure activities. The postclosure activities required to be implemented with the issuances of the postclosure permit are listed below. Based on data collected from the groundwater monitoring program, there is no evidence of releases from the HWMF at John Smith Road Landfill. Also, as part of the adjacent Municipal waste landfill (Class III) expansion, additional cover material will be added on top of the closed HWMF to ensure adequate surface water runoff drainage and further minimize infiltration at the HWMF. This grading for this additional cover was previously addressed by the County in its Negative Declaration for the Class III landfill expansion in consultation with DTSC.

BACKGROUND

The John Smith Road Landfill facility contains a closed Class I hazardous waste disposal site that occupies approximately 8 acres and received wastes between 1968 and 1983. During operation, the John Smith Road Landfill primarily received pesticide rinse water. In 1984, liquids from the site surface impoundments were removed. Hydrogeologic investigations determined that approximately one foot of waste residue was left in Impoundment One. An interim geomembrane cover was placed over the waste residue in 1988.

CLOSURE PLAN AND CORRECTIVE ACTION

In compliance with the Closure Plan and the Environmental Impact Report (EIR) for the John Smith Road Landfill, the following activities were implemented in 1992:

1. A final cover was placed over Pond 1 that consisted of:
   - Two foot thick compacted clay liner,
   - 60 mill high density polyethylene geomembrane,
   - geotextile cushion
   - one foot thick gravel drainage layer
   - geotextile filter/fabric
   - 1.5 foot thick vegetative soil cover.

2. A final cover was placed over Pond 2 that consisted of:
   - Two foot thick compacted clay liner,
   - 1.5 foot thick vegetative soil cover

3. Construction of surface water drainage ditches and erosion control measures, and

4. Groundwater containment of releases from the municipal waste landfill and removal with off site treatment through the City of Hollister Treatment Plant.

POSTCLOSURE PERMIT

In order to ensure that all of the required postclosure activities occur during the 30-year postclosure period, DTSC required the submittal of an updated postclosure permit application by John Smith Road Landfill. After DTSC determined the postclosure permit application to be complete, DTSC drafted the postclosure permit indicating the postclosure activities required to be implemented. The following are the postclosure activities described in the existing postclosure permit and the proposed replacement postclosure permit:

1) Monitoring groundwater elevation and water quality at the facility,

2) Managing contaminated groundwater of releases from the municipal waste landfill by extracting and treatment,

3) Inspecting, maintaining and repairing the structures at the facility, including the landfill, on a routine basis and after extreme natural occurrences, and

4) Providing a financial mechanism throughout the entire postclosure period to fund the above postclosure activities.

Name of Public Agency Approving Project: Department of Toxic Substances Control
Northern California Permits
and Corrective Action Branch

Name of Person or Agency Carrying Out Project: John Smith Road Landfill/
San Benito County

Exempt Status: Title 14, California Code of Regulations, section 15061(b) (3)
With certainty, no possibility of a significant effect on the environment.

Reasons Why Project is Exempt:

1. A negative declaration was prepared and certified in 1996 in support of the Postclosure Plan and Postclosure Permit. Recent Inspections have revealed no failures or malfunctions in the landfill units described below.

2. A Negative Declaration was prepared in 2001 by the County of San Benito to address potential environmental impact of continued operation of the active and expansion areas of the municipal (class III) waste landfill. In addition the Negative Declaration included corrective action and postclosure activities at the HWMF. The Negative Declaration concluded that the additional cover material, including additional subgrade, geosynthetic soil liner, and vegetative cover, will provide additional environmental protection. The Postclosure Permit requires that prior to placement of the additional cover on the landfill cap or the Class 1 cell, the county shall provide verification that the proposed survey for kit fox habitat has been completed and that either a. no habitat was present or b. adequate mitigation, to the satisfaction of the California Department of Fish and Game, has been provided. This condition is pursuant to the mitigation measure in the July 2001 Mitigated Negative Declaration prepared by the County of San Benito.

3. The Closure Certification Report as approved by an independent registered engineer certified that the John Smith Road Landfill HWMF was built according to the approved plans and is in good working order. These units include (a) the landfill subgrade, (b) the landfill cover and (c) the final site topography.

4. For the purposes of groundwater monitoring, DTSC has updated the Corrective Action Groundwater Monitoring Sampling and Analysis Plan (SAP) to adequately monitor the site hydrogeology. Major features of the SAP include: a list of Constituents of Concern, Concentration Limits, Monitoring Points, and a Reporting Program.

5. There is a corrective action remediation system to address groundwater contamination. The extraction system has been operating at the facility since 1997 and has been effective in containing the groundwater contamination.

6. The Postclosure Permit includes provisions to restrict future land uses. New use of the site will also require an amendment of the Postclosure Permit, pursuit to the specific conditions stated therein. Deed restrictions are also in place that limit future use of the property and provide notice of its former hazardous waste landfill uses.

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Signature: DRAFT-NOT SIGNED **Date:**
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Date received for filing at OPR: